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ABSTRACT

The Safe and Drug Free School and Communities Act of 1994 authorizes funding at federal, state, and local levels for school-based drug-and violence-prevention programs. This General Accounting Office (GAO) report reviews the following: (1) accountability measures required at the federal, state, and local levels (by the act); (2) activities used by the Department of Education for overseeing state and local programs; (3) how state education agencies ensure local programs' compliance with the act; and (4) how Safe and Drug-Free Schools funding is specifically used at the state and local levels. The GAO reviewed federal and state-education-agency documents; reviewed allegations of impropriety in three states (Michigan, Virginia, and West Virginia); interviewed state and local officials involved in the alleged impropriety and its investigation and resolution; and surveyed 50 states, the District of Columbia, and Puerto Rico about their activities. The four major types of accountability mechanisms include: an application process; the monitoring of activities by state agencies; periodic reports and evaluations; and the use of local or substate regional advisory councils. The Department of Education oversees state programs directly and local programs indirectly through required state actions. To date, no overall evaluations of the Safe and Drug-Free Schools program have been completed. Nearly all states use the approved local plans as the primary means for helping to ensure local programs' compliance with the act's requirements. State and local education agencies use Safe and Drug-Free Schools funds for a variety of activities. Appendices contain site-visit reports, information on methodology, data on Safe and Drug-Free Schools and Communities programs, GAO contacts, and staff acknowledgements. Contains nine tables and three figures. (LMI)

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United States General Accounting Office

GAO

Report to Congressional Requesters

October 1997

ED 414 643

SAFE AND DRUG-FREE SCHOOLS

Balancing Accountability With State and Local Flexibility

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United States
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Health, Education, and
Human Services Division

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October 10, 1997

The Honorable J. Dennis Hastert
Chairman, Subcommittee on National Security, International Affairs, and Criminal Justice
Committee on Government Reform and Oversight
House of Representatives

The Honorable Tom Harkin
Ranking Minority Member, Subcommittee on Labor, Health and Human Services, and Education
Committee on Appropriations
United States Senate

When the Safe and Drug-Free Schools and Communities Act was enacted in 1994, about 3 million thefts and violent crimes occurred on or near school campuses each year—nearly 16,000 incidents per school day. About one in five high school students regularly carried a firearm, knife, razor, club, or other weapon. After declining in the eighties, drug use rates among school-age youth increased between 1992 and 1995 for more than 10 different types of drugs. For example, one study reported that the rate of marijuana use by eighth grade students more than doubled—from about 7 to about 16 percent—and the rate for twelfth graders rose from about 22 to about 35 percent.[1]

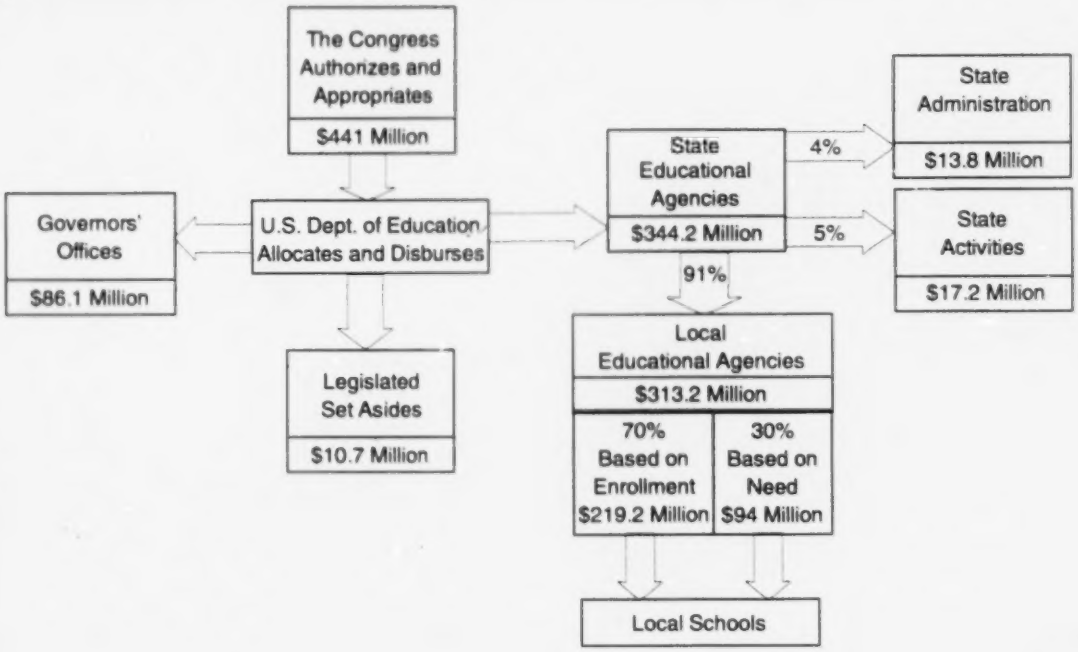
Since 1986, the federal government has awarded over $4 billion to states for implementing school-based drug- and violence-prevention programs authorized by the Drug-Free Schools and Communities Act and its successor, the Safe and Drug-Free Schools and Communities Act of 1994. One of the purposes of the Safe and Drug-Free Schools and Communities Act is to help the nation's schools provide a disciplined environment conducive to learning by eliminating violence in and around schools and preventing illegal drug use.

The Safe and Drug-Free Schools and Communities Act authorizes funding at federal, state, and local levels for programs supporting this purpose. Under the largest program funded under the act, the Department of Education awards grants to state education agencies (SEA) mainly for further distribution to local education agencies (LEA). In school year

[1]Monitoring the Future, National Institutes of Health, National Institute on Drug Abuse (Rockville, Md.: 1996).

1995-96, $350 million of the $466 million appropriated for expenditure under the act was awarded to SEAs.[2] (See fig. 1.)

Figure 1: How Funding Reaches States and Local Schools, Fiscal Year 1995



Among the changes the Safe and Drug-Free Schools and Communities Act made to the previous law were changes to increase accountability, that is, to better ensure that the activities supported by these funds are consistent with the act's general purposes. The act and its legislative history also

[2]The remainder of the money under the state grants program is distributed through the governors' program, which is used for grants to or contracts with a variety of groups, organizations, and agencies. In general, each state's allocation is determined by the size of its school-age population and the amount of part A, title I funding the state received in the previous year for providing supplementary educational services to low-achieving children in high-poverty areas. In school year 1995-96, the Safe and Drug-Free Schools state grant provided $7.90 per student for illegal drug- and violence-prevention programs.

indicate the importance of acknowledging local differences in defining measurable goals and objectives—differences reflecting local needs—and ways progress toward them will be assessed and reported. Under the act, SEAs and LEAs are accountable for progress toward the goals and objectives they set as well as for the federal dollars they spend. Increased accountability was a key issue raised in congressional deliberations about the act: critics of programs operated under the previous law claimed that some of the activities were inappropriate and would not contribute to accomplishing the goal of reducing student drug use.

To address these concerns, you asked us to review the following: (1) accountability measures the Safe and Drug-Free Schools and Communities Act requires at the federal, state, and local levels; (2) activities Education uses for overseeing state and local programs; (3) how SEAs ensure local programs' compliance with the act; and (4) how Safe and Drug-Free Schools funding is specifically used at the state and local levels. To determine required accountability measures, we reviewed the act and its legislative history. To assess Education's oversight measures, we reviewed documents at Department headquarters and followed up on allegations of impropriety in three states (Michigan, Virginia, and West Virginia), reviewing documentation and interviewing state and local officials involved in the alleged impropriety and its investigation and resolution (see app. I). To assess compliance and other activities at the state and local levels, we surveyed the 50 states, the District of Columbia, and Puerto Rico about their activities and reviewed supporting documentation, such as report forms and evaluation reports. (See app. II.)

Results in Brief

The Safe and Drug-Free Schools program is one of several substance abuse- and violence-prevention programs funded by the federal government. The act that authorizes the program requires a variety of federal, state, and local actions to ensure accountability. These actions involve four major types of accountability mechanisms: (1) an application process, requiring approval of state and local program plans; (2) monitoring activities by state agencies; (3) periodic reports and evaluations; and (4) the use of local or substate regional advisory councils. In combination, these mechanisms address accountability for both how funds are spent and progress toward achieving national, state, and locally defined goals.

Education oversees state programs directly and local programs indirectly through required state actions. Its state oversight is a combination of activities required by the act and other generally applicable requirements. Working along with states, Education reviews, helps states to revise, and, finally, approves state plans—which include a description of planned state-level activities, criteria for selecting high-need districts that will receive supplemental funds, and plans for monitoring local activities—before disbursing funds. In addition, Education conducts on-site monitoring visits. To allow states and localities enough flexibility to meet their needs, Education has issued no program-specific regulations on the act. Education does, however, require states to conform to general and administrative regulations and advises states on program matters, such as allowable expenditures, through nonbinding guidance. In addition, the Department may get involved in resolving allegations of impropriety in the use of funds. For example, Education, in response to allegations about Drug-Free Schools programs, reviewed programs in West Virginia and participated in resolving adverse audit findings in Michigan.

To date, no overall evaluations of the Safe and Drug-Free Schools program have been completed. In addition to its activities intended to ensure that funds are spent appropriately, however, Education conducts evaluation activities designed to provide both descriptive and evaluative information about the programs. The descriptive information should document the nature and extent of school violence, as well as the characteristics of federally funded violence-prevention programs and their activities, including those of the Safe and Drug-Free Schools program. Education's evaluative activities focus on broader aspects of program implementation, such as promising practices and program improvement processes, but will not specifically assess the effectiveness of all Safe and Drug-Free Schools programs nationwide. Instead, Education is indirectly gathering information about the effectiveness of specific state and local programs through reports states must submit to Education every 3 years. The lack of uniformity in what states report, however, may create a problem for federal oversight. A survey of LEAs may provide additional information on local program effectiveness, but that study is still in the planning stages.

Nearly all states use the approved local plans as the primary means for helping to ensure local programs' compliance with the act's requirements. States use local compliance with the approved plans as a way of ensuring that funds are spent on activities permitted under the act. Under the act, each state may establish its own reporting requirements for LEAs. Although these requirements have some common elements—40 states require a

program report, and 42 states require a financial report—state requirements generally vary widely. Most states use both on-site visits and local self-reports to oversee local program activities. States also resolve allegations of impropriety, as in the Virginia case we reviewed. LEAs are also required to evaluate the effectiveness of their programs, but most states reported in our survey that they had little specific knowledge of the content or results of these evaluations.

SEAs and LEAs use Safe and Drug-Free Schools funds for a variety of activities, as permitted by the act. States mostly use their 5-percent set aside for activities, such as training and technical assistance, although they also use the funds for such activities related to curriculum development, violence prevention, state-level evaluations, and demonstration projects. Services provided by 60 percent or more of LEAs nationwide include drug-prevention instruction for students; staff training; general violence-prevention instruction; special one-time events, such as guest speakers, drug- and alcohol-free social activities, such as a dance or picnic; parent education/involvement; student support services, such as counseling and referral services; and curriculum development and acquisition. Ninety-one percent of LEAs provide drug-prevention instruction. Staff training is the next most offered activity, with 77 percent of districts reporting such training.

Background

In October 1994, the Improving America's Schools Act, which reauthorized education programs under the Elementary and Secondary Education Act of 1965 (ESEA), revised and expanded drug education under the Safe and Drug-Free Schools and Communities Act of 1994, which is title IV of ESEA. The purpose of the Safe and Drug-Free Schools Act is to create a comprehensive program to support National Education Goal Seven, which is "by the year 2000, every school in the United States will be free of drugs, violence, and the unauthorized presence of firearms and alcohol and will offer a disciplined environment conducive to learning." School year 1995-96 was the first school year in which the program was in effect.

Safe and Drug-Free Schools grants have some of the broad characteristics of block grants that we have identified in previous work.[3] For example, the act authorizes federal aid for a wide range of activities within a broadly defined functional area; recipients have substantial discretion to identify

[3]Block grants provide significant discretion to states and localities to define and implement federal programs according to local needs and conditions. For a complete list of the characteristics of block grants as well as the issues involved in ensuring accountability in block grant programs, see Block Grants: Issues in Designing Accountability Provisions (GAO/AIMD-95-226, Sept. 1, 1995).

problems, design programs, and allocate resources; federally imposed requirements are limited to those necessary to ensure that national goals are being accomplished; and federal aid is distributed on the basis of a statutory formula. For such grants, accountability plays a critical role in balancing the potentially conflicting objectives of increasing state and local flexibility, while attaining certain national objectives.

Safe and Drug-Free Schools Part of Education's Strategic Plan

The Safe and Drug-Free Schools program is discussed as part of Education's strategic plan required by the Government Performance and Results Act of 1993[4] (the Results Act). The Results Act requires executive agencies, including Education, to develop a 5-year strategic plan that includes long-term strategic goals,[5] establish annual performance goals, and report on progress toward those goals and objectives. Education's draft strategic plan for 1998-2002 includes an objective for safe, disciplined, and drug-free schools.[6] Education's statement of core strategies for achieving this objective make it clear that Safe and Drug-Free Schools will play a major role. In addition, the program is specifically cited in one of the six performance indicators that Education has chosen for assessing accomplishment of this objective. These indicators are to

- slow recently increasing rates of alcohol and drug use among school-aged children by 2000;
- achieve continuous decreases in criminal and violent incidents in schools by students between now and 2002;
- realize continuous improvement in the percentage of students reporting negative attitudes toward drug and alcohol use between now and 2002;

[4]The Government Performance and Results Act of 1993 is intended to improve the efficiency and effectiveness of federal programs by establishing a system to set goals for program performance and to measure results. Specifically, the Results Act requires executive agencies to prepare multiyear strategic plans and annual performance plans and reports. For general information on implementation of the Results Act, see The Government Performance and Results Act: 1997 Governmentwide Implementation Will Be Uneven (GAO/GGD-97-109). For specific information on Education's plan, see The Results Act: Observations on the Department of Education's June 1997 Draft Strategic Plan (GAO/HEHS-97-176R, July 18, 1997).

[5]The first 5-year strategic plan must be submitted to the Congress by Sept. 30, 1997.

[6]See U.S. Department of Education: Strategic Plan, 1998-2002, Draft for Consultation and Review (Washington, D.C.: June 17, 1997).

- improve prevention programs by having the majority of LEAs participating in the Safe and Drug-Free Schools program use prevention programs based on Education's principles of effectiveness by 1999;[7]
- ensure, by 1999, that all states collect data statewide on alcohol and drug use among students and violence in schools; and
- increase significantly by 2000 the number of teachers who are appropriately trained to address discipline problems.

Other Federal Laws and Regulations Also Set Accountability Requirements for Safe and Drug-Free Schools Program

The Safe and Drug-Free Schools program, like other Education programs, is subject to other federal laws and generally applicable regulations in the use of its funds and program operations. For example, the Education Department General Administrative Regulations apply to the Safe and Drug-Free Schools and Communities program as well as other grant programs. These regulations establish uniform requirements for administering Education grants and principles to determine costs for activities assisted by the Department. In addition, the Single Audit Act requires each state to conduct annual independent audits of programs in the state that receive federal funds.

Some aspects of the Safe and Drug-Free Schools program are also affected by the general provisions of the Improving America's Schools Act of 1994. In particular, the Improving America's Schools Act authorizes states to submit a single application for several federal education programs rather than separate program-specific applications. The new consolidated application process, which began with school year 1995-96 funds for Education programs, including the Safe and Drug-Free Schools program, is intended to enhance program integration and reduce SEAs' administrative burden.

The Improving America's Schools Act also requires Education to establish procedures and criteria under which a SEA may submit a consolidated application or plan. Education's guidelines state that the consolidated plan should provide a framework for determining, within the context of a state's school reform plan and other reform initiatives, how the federal

[7]These principles were published in a notice soliciting public comments in the July 16, 1997, edition of the Federal Register. The principles would require LEAs to develop Safe and Drug-Free programs on the basis of an objective analysis of the need for drug- and violence-prevention services and to use program approaches whose effectiveness has been demonstrated through research.

programs in the consolidated plan will be used to help all children reach the state's academic achievement goals.[8]

Education's guidance for the consolidated applications requires states to include some, but not all, of the information required in comprehensive state plans by the Safe and Drug-Free Schools and Communities Act. States must include in their consolidated application their criteria for selecting LEAs for supplemental high-need funding, their plans for spending the 5-percent set aside for state-level program activities, and their process for approving local plans for funding.

Many Programs Support National Safe and Drug-Free Schools Goal

While the Safe and Drug-Free Schools program's explicit goal is to reduce drug use and violence in schools, other programs are also likely to influence progress toward this national goal. The Safe and Drug-Free Schools program is one of several substance abuse- and violence-prevention programs funded by the federal government. For example, in fiscal year 1995, 70 federal programs were authorized to provide either substance abuse-prevention or violence-prevention services or both to the youth they serve.[9] Thirty-four of these programs could provide both types of prevention services. Education, which administers the Safe and Drug-Free Schools program, along with the Departments of Health and Human Services and Justice, administered most of these programs, 48 in all, but the rest of the programs were disbursed among 10 other federal agencies or entities. For these 70 programs, the fiscal year 1995 appropriations for services to youth totaled at least $2.4 billion.

Multiple programs dispersed among several agencies creates the potential for inefficient services and ineffective use of funds. Although we have not fully examined these multiple programs, the implications of having multiple, unintegrated substance abuse- and violence-prevention programs might be like those for employment training programs—an area we have examined. In fiscal year 1995, we identified 163 federal employment training programs located in 15 departments and agencies. We recently concluded that consolidating these programs could probably reduce the cost of providing job training services because of the efficiencies achieved by eliminating duplicative administrative activities. Furthermore,

[8]If a state submits and has approved a consolidated application, rather than a comprehensive one, the state may require LEAs receiving funds from more than one program to submit consolidated LEA applications that cover all applicable programs.

[9]See Substance Abuse and Violence Prevention: Multiple Youth Programs Raise Questions of Efficiency and Effectiveness (GAO/T-HEHS-97-166, June 24, 1997).

consolidating similar programs could improve opportunities to increase service delivery and effectiveness.[10]

Questions Raised About Program Expenditures and Activities

During the past several years, some members of the Congress, in response to constituents' concerns, have questioned how some states and localities have used funding under both the Drug-Free Schools and Communities Act and Safe and Drug-Free Schools and Communities Act programs. Allegations about misuse of funds have spanned diverse areas of program operation, from curriculum content to administrative expenses. In particular, questions have been raised about the extent to which these funds can be used to support programs, such as comprehensive health education programs, of which drug prevention is just one part; the types of activities sponsored by schools, such as alcohol-free dances; and expenditures for materials, such as pencils and tee-shirts imprinted with drug- and violence-prevention messages (see app. I for the results of our examination of some allegations).

Act Requires Federal, State, and Local Actions to Ensure Accountability

The Safe and Drug-Free Schools and Communities Act establishes accountability mechanisms at the federal, state, and local levels. In combination, these mechanisms provide accountability for both spending funds (financial accountability) and reaching national, state, and locally defined goals (program accountability). The act specifies no mechanisms for direct federal oversight of local activities. Rather, the act's mechanisms for federal oversight of the program focus on state-level programs and activities, while relying on state actions for local program oversight. The act establishes four types of accountability mechanisms: (1) an application process that requires approval of state and local plans; (2) state monitoring of LEAs' programs; (3) reports on national, state, and local program effectiveness; and (4) LEAs' use of advisory councils to develop program plans and assist program implementation.

Federal Requirements Focus on State Plans, National Assessments

Education executes two of the four actions required by the act for ensuring accountability in the Safe and Drug-Free Schools program: approving state plan applications and reporting on national, state, and local program effectiveness.[11] The act requires Education to review and

[10]See Department of Labor: Challenges in Ensuring Workforce Development and Worker Protection (GAO/T-HEHS-97-85, Mar. 6, 1997).

[11]The application approval action also includes approval of local plans for which states are responsible.

ensure that state plans for Safe and Drug-Free Schools programs conform with federal requirements before providing funding to a state. The act also directs Education to use a peer review or similar process in reviewing state plans and provides detailed requirements for the contents of the state plan. For example, under the act, states must include in their plans (1) measurable goals and objectives for their drug- and violence-prevention programs, (2) a description of state-level program activities, (3) their plans for monitoring LEAs' programs, and (4) the state's criteria for identifying high-need districts that will receive supplemental funding for drug- and violence-prevention programs.

The act also requires Education to gather data about school violence and drug abuse and to assess the effectiveness of drug- and violence-prevention activities under the Safe and Drug-Free Schools program and other recent federal initiatives. Education expects to report the results of these assessments, along with its recommendations, to the Congress by January 1998. The act also requires, indirectly, that Education collect data from states on the effectiveness and outcomes of state and local programs. That is, under the act, LEAs must provide the state with information about their programs' effectiveness, which states must then use in their required reports to Education.

Federal Requirements for States Focus on Oversight of Local Programs

Under the act, states must use application approval, program monitoring, and reporting as accountability mechanisms for ensuring that Safe and Drug-Free Schools programs conform with federal requirements. States must review applications from LEAs to determine if they are eligible for funding. Through the application process, states must ensure that each LEA receiving funds has (1) measurable goals for its drug- and violence-prevention program, (2) objectively assessed students' current use of drugs and alcohol as well as violence and safety problems in its schools, and (3) developed plans for a comprehensive drug- and violence-prevention program. The comprehensive plan must describe how the LEA will use its funds; coordinate its efforts with communitywide efforts and other related federal, state, and local programs under this or other acts; and report progress toward the LEA's drug- and violence-prevention goals. In addition, states may also require the submission of other necessary information and assurances. The act requires each state to monitor local program implementation and report to Education on its progress toward its drug- and violence-prevention goals.

Although the act lists several general oversight responsibilities for states, it does not clearly specify actions states must take to meet these responsibilities. For example, although states must monitor local program implementation, the act leaves states to determine how to do this. In addition, it authorizes states to develop their own reporting requirements for LEAs and determine when LEAs must report on their programs.

The act requires LEAs to consult with local or substate regional advisory councils in developing applications for state funds. These councils also regularly review program evaluations and other relevant material and make recommendations to LEAs for improving drug- and violence-prevention programs. In addition, these councils distribute information about drug- and violence-prevention programs, projects, and activities conducted by LEAs and advise LEAs on coordinating such agency activities with other related programs, projects, and activities as well as on the agencies administering such programs, projects, and activities. Education's General Administrative Regulations require the state to oversee the LEA programs to ensure that such advisory councils are used as intended. Because the focus of our analysis was to describe and assess the accountability measures used at the federal and state levels, we did not assess how these advisory councils operate at the local level.

Act Also Sets Requirements for Program Content and Activities

The act, in addition to establishing actions federal, state, and local agencies must take to ensure accountability, has some requirements for program content and the types of activities permitted under the law. These requirements are broadly stated, permitting significant discretion at the state and local levels. The act also includes some prohibitions on how funds may be used and restricts Education's activities regarding curriculum that may be used in state and local programs.

Comprehensive Programs Mandated

Local drug- and violence-prevention programs under the act must be comprehensive. The act requires that comprehensive programs be designed for all students and employees. Programs for students must be designed to prevent use, possession, and distribution of tobacco, alcohol, and illegal drugs; prevent violence and promote school safety; and create a disciplined environment conducive to learning. For employees, the program must be designed to prevent the illegal use, possession, and distribution of tobacco, alcohol, and illegal drugs. The act also requires these comprehensive programs to include activities that promote the

involvement of parents and coordination with community groups and agencies.

Activities Allowed

The act identifies a wide range of programs and activities that a LEA may include in its comprehensive program, though the act does not limit LEAs to the examples it provides. For example, programs noted as permissible include comprehensive drug prevention; comprehensive health education, early intervention, student mentoring, and rehabilitation referral programs that promote individual responsibility and offer techniques for resisting peer pressure to use illegal drugs; and before- and after-school recreational, instructional, cultural, and artistic programs in supervised community settings.[12]

Activities allowed for these programs include the distribution of drug-prevention information; professional development of school personnel, parents, and law enforcement officials through activities such as workshops and conferences; implementation of strategies that integrate services to fight drug use such as family counseling, early intervention activities to prevent family dysfunction and enhance school performance; and activities designed to increase students' sense of community such as community-service projects. Funds may also be used for metal detectors, safe-passage zones—crime- and drug-free routes students may take to and from school—and security personnel; such uses, however, are limited to no more than 20 percent of a LEA's funds and are allowed only if a LEA has not received other federal funding for these activities. The law explicitly prohibits use of program funds for construction (except for minor remodeling), medical services, or drug treatment or rehabilitation.

Materials and Curricula Allowed

Materials used in Safe and Drug-Free Schools programs must convey a clear and consistent message that the illegal use of alcohol and other drugs is wrong and harmful. The Secretary of Education may not prescribe the use of any specific program curricula but may evaluate the effectiveness of the curricula and strategies used.

[12]The emphasis on a comprehensive program and the wide range of activities allowed by the act are consistent with the findings of our previous studies: see Drug Control: Observations on Elements of the Federal Drug Control Strategy (GAO/GGD-97-42, Mar. 14, 1997); School Safety: Promising Initiatives for Addressing School Violence (GAO/HEHS-95-106, Apr. 25, 1995); and Adolescent Drug Use Prevention: Common Features of Promising Community Programs (GAO/PEMD-92-2, Jan. 16, 1992).

Distribution of Funds

Most of the funds for state and local drug- and violence-prevention programs must be distributed to LEAs. From the funds awarded to SEAs for state and LEA grant activities, SEAs may reserve no more than 5 percent for statewide activities and no more than 4 percent for program administration. The remaining funds (at least 91 percent) must go to LEAs; in school year 1995-96, this amounted to $313 million. Thirty percent of this amount, $94 million in school year 1995-96, must go to LEAs that the state has determined have the greatest need for additional funds to carry out drug- and violence-prevention programs. The act requires states to provide these supplemental funds to no more than 10 percent of the state's LEAs, or five such LEAs, whichever is greater.

Education Uses State Application Process, Monitoring, and Reports for Program Oversight

Education uses several mechanisms to execute its responsibilities for ensuring program accountability. Some of these mechanisms are required by the Safe and Drug-Free Schools and Communities Act; others are required or permitted under other generally applicable laws and regulations such as the Single Audit Act and the Education Department General Administrative Regulations. Some of these activities—such as the application review process—are intended to ensure that program activities and expenditures comply with federal requirements. Others seek to determine if programs are addressing national goals.

Plans Form Basis for Accountability

State and local plans form the basis for Safe and Drug-Free Schools accountability. States cannot get Safe and Drug-Free Schools funds without submitting a plan consistent with the act and approved by Education. Education reviews states' plans for compliance with the act and other federal requirements and for program quality. In addition, state plans provide Education with detailed information on what states want to accomplish with their funding and their program management strategy.

Education Properly Reviewed Applications for School Years 1995-96 and 1996-97

Our review of Education's files on 16 state plans for school years 1995-96 and 1996-97[13] showed that Education, as required by the act, reviewed state plans and required states to revise plans that did not conform with the law's requirements before disbursing funding to the states. Education reviewed each application to ensure the completeness and sufficiency of the information provided. When reviewers identified missing or inadequate information, they asked the states to provide additional information, and

[13]We reviewed files for the following states: Connecticut, Delaware, Illinois, Indiana, Iowa, Massachusetts, Michigan, Missouri, Nebraska, Nevada, New York, Rhode Island, Tennessee, Texas, West Virginia, and Wyoming.

Education notified states on time that they would receive their grant awards.

For school year 1996-97, states submitted their plans on time, and Education again reviewed the plans for conformity with federal requirements. Although Education sometimes requested additional information from states before awarding Safe and Drug-Free Schools funding, the Department also approved some state plans conditionally. In these cases, Education specified in states' grant award documents additional time—1 year—for them to revise their plans to conform with federal requirements.

Education established procedures for its review of state plans and provided its staff with checklists and other forms on which to document the results of these reviews. These procedures varied little for the 2 years encompassing our review. Education documented the results of its review in departmental records, including at least a copy of each state's plan, the reviewers' comments, material from each state responding to Education's request for supplemental information, and grant award documents.

In both years, Education's review included checks for compliance with the act. For example, Safe and Drug-Free Schools program staff initially reviewed plans, checking to make sure each state plan had all of the law's required assurances, signatures, and plan components. Education asked states whose plans did not pass this review to supply the missing information. Program staff also read state plans, documenting any planned activities that failed to conform with or fully satisfy federal requirements. Program staff then shared the results of this review with state officials, requested additional information, or suggested plan revisions.

Education also reviewed state plans for quality as part of its plan approval process for the 2 years we reviewed. For school year 1995-96 plans, Education's Safe and Drug-Free Schools program staff conducted this review and raised questions with state officials about a variety of program quality issues such as the planned program's ability to address assessed needs. For school year 1996-97 plans, Education used a peer review process, with program staff from various Office of Elementary and Secondary Education programs as reviewers along with external experts. Education's process for the quality review was essentially the same for 1996-97 plans as it had been for 1995-96 plans.

Education Conducts Monitoring Activities

Education also monitors states' activities. Monitoring activities include state and local visits, reviews of state audit findings, and investigations by Education's Inspector General (IG). Each monitoring visit involves an initial visit to a SEA; subsequent visits to local school districts may also be a part of the monitoring visit.

Until September 1994, Education's on-site monitoring visits were program specific; that is, they were made only to review Drug-Free Schools' state and local program activities. In school year 1993-94, Education conducted program-specific monitoring reviews in three states; in school year 1994-95, Education conducted two such reviews. The Department used a variety of criteria to select states for on-site reviews, including complaints.

In September 1994, however, Education changed the way it conducted on-site monitoring reviews. The Department's new process—called an integrated review process—uses an entire team of Education officials[14] representing all the federal education programs in which a state participates to review a state's use of federal aid to reach its educational goals. Education piloted this integrated review process in school year 1994-95, visiting five states. In school year 1996-97, Education visited 20 states to conduct integrated reviews, which included reviews of Safe and Drug-Free Schools programs.

In addition, the Department has in the past visited states to resolve allegations of impropriety related to the use of funds under the Drug-Free Schools and Communities Act. Education did so in West Virginia in 1992 and in resolving adverse audit findings in Michigan in 1994. In West Virginia, Education received a complaint letter from a parent and directed the state superintendent of education to investigate. Education officials twice visited West Virginia—first in 1992 and again in 1994—in response to complaints about the curriculum used in one LEA's Drug-Free Schools program. As part of their review, federal officials interviewed state and local education officials and reviewed relevant curriculum materials.

In Michigan, state auditors questioned some LEA expenditures under the Drug-Free Schools and Communities Act. The findings were reviewed by Education's IG and the program staff. The Department sustained some findings but disallowed others. (See app. I.)

[14]The team is called a regional service team and includes staff from program offices in the Office of Elementary and Secondary Education. Education has divided the country into eight regions; each region has six to eight states. Each regional service team oversees the federally funded programs and provides technical assistance to the states in its region.

Education also uses its reviews of state audit findings and on-site IG reviews to stay informed of state activities. Each year, states' federally funded programs must be independently audited as part of the federally required single state audit process.[15] These audits—which may include the Safe and Drug-Free Schools program—identify specific findings, such as expenditures not allowable under the authorizing legislation. These findings are resolved by the Assistant Secretary, Office of Elementary and Secondary Education, who sustains or rejects the findings after considering information provided by the auditor and auditee. The single state audits have uncovered improper and questionable expenditures in state and local programs. For example, state auditors in Michigan uncovered questionable state expenditures of federal Drug-Free Schools and Communities Act funding. Their findings triggered a state legislative review of the program.

In the last 3 fiscal years, Education's IG has conducted two studies of activities under Drug-Free Schools.[16] A citizen's complaint prompted a 1995 audit of certain financial matters in the administration of the West Virginia program. In response to the complaint, Education's IG sought to determine if one of West Virginia's regional education service agencies was administering its Drug-Free Schools program in compliance with applicable federal acts and regulations.[17] More recently, in February 1996, the IG issued a report describing the programs offered in nine local Drug-Free Schools programs in eight states.[18]

Although the IG work plan for fiscal years 1996 and 1997 includes no audits of any Safe and Drug-Free Schools activities, the 1997-98 draft work plan includes two audits of Safe and Drug-Free Schools and Communities Act activities. The first audit would examine the use of Safe and Drug-Free Schools funds and the amount of such funding reaching the classroom. The second audit would review program performance indicators. In

[15]The Single Audit Act requires states and local entities to undergo a comprehensive single audit of their financial operations. Some states and local entities, however, are excluded from the requirements because the funding is lower than thresholds established by the law. States submit their audit reports to the Single Audit Clearinghouse. The Clearinghouse sends reports with findings directly to the Office of the Chief Financial Officer, who then distributes the appropriate sections of the reports to the relevant program offices for resolution.

[16]According to Education officials, most IG staff are assigned to work on the larger Student Financial Assistance programs. IG staff in areas not related to the student financial assistance programs focus on programs scheduled for upcoming reauthorization.

[17]See app. I for a more detailed explanation of the allegations and subsequent investigations.

[18]Correspondence to the Honorable William H. Zeliff, Jr. dated Feb. 8, 1996, from Steven A. McNamara, Assistant Inspector General for Audit, U.S. Department of Education.

addition, Education issued an audit supplement in June 1996 providing further guidance that will be used, for example, when states audit Safe and Drug-Free Schools activities. The supplement, which pertains to several Education programs amended by the Improving America's Schools Act, will be used immediately by the states to conduct audits of school year 1995-96 program grantee activities. Suggested audit procedures include reviews of funded activities, expenditures, and other related records to determine whether Safe and Drug-Free Schools funds were used for any prohibited activities.

Education to Report on Program Performance and Effectiveness

As required by the act, Education is gathering information about the Safe and Drug-Free Schools program. Overall, Education's data collection and evaluation activities comprise a (1) national evaluation of drug- and violence-prevention activities, including those funded under the Safe and Drug-Free Schools program;[19] (2) national data collection on violence in schools; (3) national survey to gather information about local program improvement activities; and (4) compilation of state-level reports on program effectiveness and progress toward state- and locally defined goals for drug and violence prevention. Education plans to provide information from these components, except the survey of LEAs, to the Congress in January 1998. No date has been established for reporting results of the local survey.

National Studies Provide Information on School Violence-Prevention Activities

Education, in collaboration with the National Institute of Justice, has begun to evaluate the impact of violence-prevention programs as required by the act.[20] The evaluation is designed to describe the types of activities funded with federal violence-prevention moneys, including Safe and Drug-Free Schools funds, and to identify the most promising practices among these activities. To acquire this information, the evaluation will compare matched pairs of schools with similar characteristics, but dissimilar safety profiles, to determine why the schools differ on certain safety measures. The evaluation should provide information about the effectiveness of specific interventions, officials told us, such as peer mediation, as well as broader influences on program effectiveness, such as

[19]Under the previous Drug-Free Schools and Communities Act, Education sponsored a number of studies on drug-prevention activities. These studies included a required biennial survey of SEAs that obtained information on program characteristics and state administrative activities, an assessment of student outcomes in drug-prevention programs, and a longitudinal study of drug-prevention activities in 19 school districts that provided information on promising practices and program effectiveness.

[20]Education's collaboration with the National Institute of Justice, a part of the U.S. Department of Justice, will build on and expand a National Institute of Justice study. Education officials say the collaborative effort will allow the inclusion of more programs in the study.

school order and organization and class size. It will not describe the effectiveness of specific Safe and Drug-Free Schools and Communities programs nationwide.

In addition to evaluating violence-prevention programs, Education, through its Center for National Education Statistics, is gathering descriptive data on violence in the nation's schools. The data were obtained by survey from a nationally representative sample of schools and, in conjunction with existing national databases, will provide detailed information on the extent and nature of violence in schools.

Local Survey on Program Improvement Planned

Although not required by the act. Education officials told us they plan to survey a nationally representative sample of LEAs participating in the Safe and Drug-Free Schools program to examine program improvement at the local level. The survey, designed to gain information about LEAs' assessment of program effectiveness and their use of such information in ongoing program implementation, will ask LEAs to report the goals and objectives established for their Safe and Drug-Free Schools programs and the measures they use to assess progress toward these goals. Though plans for the survey have not been completed, Education officials report that this survey should be the first of periodically administered surveys to obtain this information.

State Triennial Reports

The state-level reports on program effectiveness required by the act are likely to be the primary source of information about Safe and Drug-Free Schools programs' effectiveness, both nationally and locally. Education—though not required to do so—has provided states with suggested program performance indicators that may be used to assess and report program effectiveness. However, it is uncertain to what extent data from these indicators will provide information about the effectiveness of Safe and Drug-Free Schools and Communities programs. First, states do not have to use Education's indicators but may develop and use their own indicators. Second, though the indicators were made available to states in draft form in August 1996, states did not receive the completed data collection instrument until December 1996. As a result, variability in state data collection efforts may prevent some states from providing the desired information, and Education officials acknowledge this. Expecting difficulties in aggregating data from the state-level reports, the Department is working with a private contractor to categorize and summarize the data. Education officials expect state data to conform more closely with Education's performance indicators, they said, as states become more

familiar with the form and have a chance to adjust their own data collection systems.

Although the act requires reports every 3 years, Education is providing states with a mechanism to furnish yearly information. Education has no information yet to estimate how many states, if any, will provide information more often than every 3 years.

States Review and Approve Local Plans and Monitor Activities

Nearly all states use approved local plans as the primary means for ensuring a local program's compliance with the act's requirements as well as a variety of other methods. States' use of the plans to ensure compliance often begins when LEAs submit their plans for state approval, with states using the approval process to ensure that a LEA's planned program conforms with the act's requirements. Once local plans have been approved, state officials monitor local programs, they said, using site visits, telephone contacts, and reviews of reports submitted by LEAs of their program activities and expenditures. A few states reported using a combination of these methods to oversee local programs.

State Practices Emphasize Planning and Conformance to Plans

States must approve local plans before a LEA may receive its Safe and Drug-Free Schools grant. State approval, however, is not automatic. Ninety-six percent of the state officials responding to our survey said some LEAs had to revise their plans to obtain state approval. A plan could be judged unacceptable for minor or rather major reasons, state officials told us. For example, a plan lacking all the appropriate signatures might require only minor revisions. Other plans, however, such as those lacking measurable goals and objectives or those with budgets that were incongruent with the planned program activities, might require more substantial revision. Most local plans, however, are eventually successfully revised and gain state approval. In school year 1995-96, only a small percentage of LEAs did not receive Safe and Drug-Free Schools funding because their plans were not approved, state officials told us.

State Process Varies for Review of LEA Plans

The act requires states to use a peer review or other method of ensuring the quality of applications. More than half the states use a peer review process. Officials in 29 states told us they use a peer review process; in 19 of those states, the peer reviewers' decisions are binding. The composition of peer review panels varies by state. In some states, peer review panel members include representatives from the LEAs. Georgia and Virginia, for example, are among the states that reported using LEA representatives as

peer reviewers. In other states, such as Colorado, Alabama, and Idaho, peer reviewers come from diverse groups such as the SEA's staff, Safe and Drug-Free Schools advisory group, and local drug-prevention experts. States that reported using no peer review panel told us that SEA officials review and approve local plans.

In the states we visited, officials use their review of local plans to ensure that LEAs' planned activities conform with the act's requirements. West Virginia's coordinator told us that she reviews each local plan for compliance. In Michigan, state officials must certify in writing that each approved local plan conforms with the act's requirements. We heard similar anecdotal evidence when we spoke with our survey respondents. For example, officials in Arizona and Nebraska also reported reviewing local plans for compliance as part of the local plan approval process.

States Use Variety of Mechanisms to Monitor Local Programs

States reported that they monitor local activities and expenditures, in accordance with the act, using a variety of mechanisms, such as site visits and document reviews. Most state Safe and Drug-Free Schools officials who use site visits to monitor said site visits are the most effective method for monitoring LEA activities. Documents reviewed by states include program and expenditure reports from LEAs. States use the local plan to monitor program compliance as well as to develop the framework for site visit observations. A few state officials also cited several barriers to monitoring local activities. The most prominent of these are resource shortages, that is, lack of staff and time.

State officials oversee local programs by visiting LEAs, reviewing LEAs' program and expenditure reports, as well as making phone contacts. In school year 1995-96, state officials in 48 states[21] and Puerto Rico reported making more than 1,900 site visits to local programs; 18 states, Puerto Rico, and the District of Columbia used site visits more frequently than any other oversight method. Although 22 states reported making regular site visits, 12 states selected the sites they visited randomly. Nineteen states reported visiting sites on the basis of LEA requests or complaints. States also selected sites to visit on the basis of other criteria such as the need for technical assistance, the amount of carryover funds, and whether the LEA had received additional funding because it was considered "high need."

[21]Because Hawaii has only one LEA, it is not a part of these analyses. Rhode Island reported that it does not monitor LEAs.

When asked how often they expected to perform site visits to local programs, 16 states that performed site visits in school year 1995-96 said they expected to visit each local program once every 3 years. Only 3 states, the District of Columbia, and Puerto Rico expected yearly visits; 19 states said they expected to visit programs every 3 to 4 years. Site visits include a wide range of activities, from reviewing program records to on-site observations, state officials told us. Most of the states that conducted site visits in school year 1995-96, however, reported the following common activities: examining program and financial records; reviewing the local curriculum; and interviewing staff, students, and parents.

In addition to site visits, state officials in 31 states and the District of Columbia said they oversee local programs by reviewing documents provided by LEAs. Nine states reported this as the most often used monitoring method. Only five states reported using phone calls or technical assistance contacts as the most often used method for monitoring local activities. (See table III.6 in app. III.)

The states we visited use most of the mechanisms cited by our survey respondents to monitor LEAs' program activities and expenditures. For example, Michigan and West Virginia use site visits and reviews of LEAs' program and expenditure reports to ensure that programs are implemented in compliance with the act. West Virginia's coordinator told us she also uses telephone contacts as a monitoring mechanism. Virginia's coordinator, citing staff shortages as the reason the state could not visit sites in school year 1995-96, said the state relies on its review of LEA expenditure reports to monitor LEA programs. Although the three states' local reporting requirements differ somewhat, each state requires LEAs to submit an annual progress report, including information on their programs' activities and expenditures as well as expenditure reports.

State officials have established standard policies and procedures for site visits, our research revealed. Michigan's Office of Drug Control Policy, for example, has developed a "Local Program Review Guide" that SEA staff must use when monitoring LEA sites. The guide has specific questions about the local program's characteristics, such as curriculum content, parental involvement, and the local advisory council. The state reviewer must document findings for each characteristic. The guide also specifies the type of documentation to be used. West Virginia has also written policies and procedures to guide monitoring practices. In addition to reviewing program records, West Virginia's State and Drug-Free School coordinator said she conducts interviews with local program

administrators and actually observes program activities. Beginning in the 1996-97 school year, she told us, she also plans to include a review of local vouchers in her site visit activities in response to a recommendation by the state auditor.

Periodic Fiscal and Program Reports and Evaluations Required

Local Program and Expenditure Reports Help States Monitor LEA Programs

As permitted under the act, all states we surveyed had established reporting requirements for LEAs receiving Safe and Drug-Free Schools funds. Generally, states most often rely on annual reporting, although a few states require semiannual or monthly reporting. For example, 36 states reported that they require LEAs to provide an annual progress report. Three states require more frequent reports. Twenty-eight states said they require an annual expenditure report; 17 states require LEAs to report on their expenditures more frequently. In addition, seven reported that they require monitoring reports of LEAs when the LEAs visit program sites.

In addition to these requirements, most states require LEAs to submit a report documenting their expenditures before the state releases funding to them. Twenty-six of the states distribute funds on a reimbursement basis, they said. LEAs use their own funds to pay program costs and are later reimbursed for their expenditures by the state. The timing and information requirements of these reports vary, with some states requiring a more detailed explanation of spending than others. For example, Michigan Safe and Drug-Free Schools officials require LEAs to report just the total amount of money spent as of the date the state requests reimbursement. In contrast, South Dakota requires LEAs to send in copies of their vouchers before being reimbursed for program funds, according to state officials.

Evaluations

States must obtain information from LEAs for the required triennial reports to Education describing the implementation, outcomes, effectiveness, and progress of state-level and LEA-operated programs. At the time of our survey, however, many states had little information about the extent and nature of program evaluation activities at the local level. For example, of those state officials who reported local evaluation activities, many did not know the number of LEAs conducting evaluations or the objectives and activities of the LEA evaluations. In addition, we asked state officials what

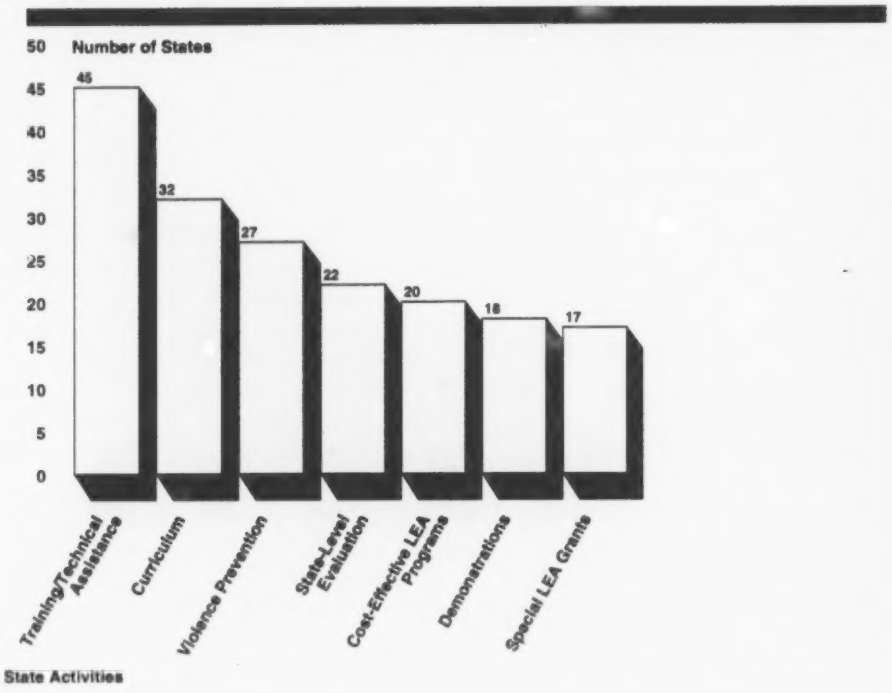
information they planned to include in their triennial reports. Many of the state officials who responded to this question told us they either had not determined what information they would include in their report or that they would include whatever information Education required of them.

SEAs and LEAs Report Varied Uses of Funds

As permitted under the act, SEAs and LEAs use Safe and Drug-Free Schools funds for a variety of activities. Although states often require LEAs to report on their expenditures, the reported data are seldom routinely aggregated to provide a statewide picture of Safe and Drug-Free Schools spending. State officials do not aggregate expenditure data, they told us, because no reporting requirement exists for them to do so.

Although states use their program funds to provide a variety of services, in most states, training and technical assistance for LEA staff and others, including parents, is a frequent investment (see fig. 2 and table III.2 in app. III). Forty-five states and Puerto Rico said they use a portion of their state program funds in this way. Other categories of expenditures reported by many states include curriculum development and acquisition (32 states), violence prevention (27 states), and state-level program evaluation (22 states). Other activities reported included demonstration projects (18 states) or activities to provide cost-effective programs to LEAs (20 states).

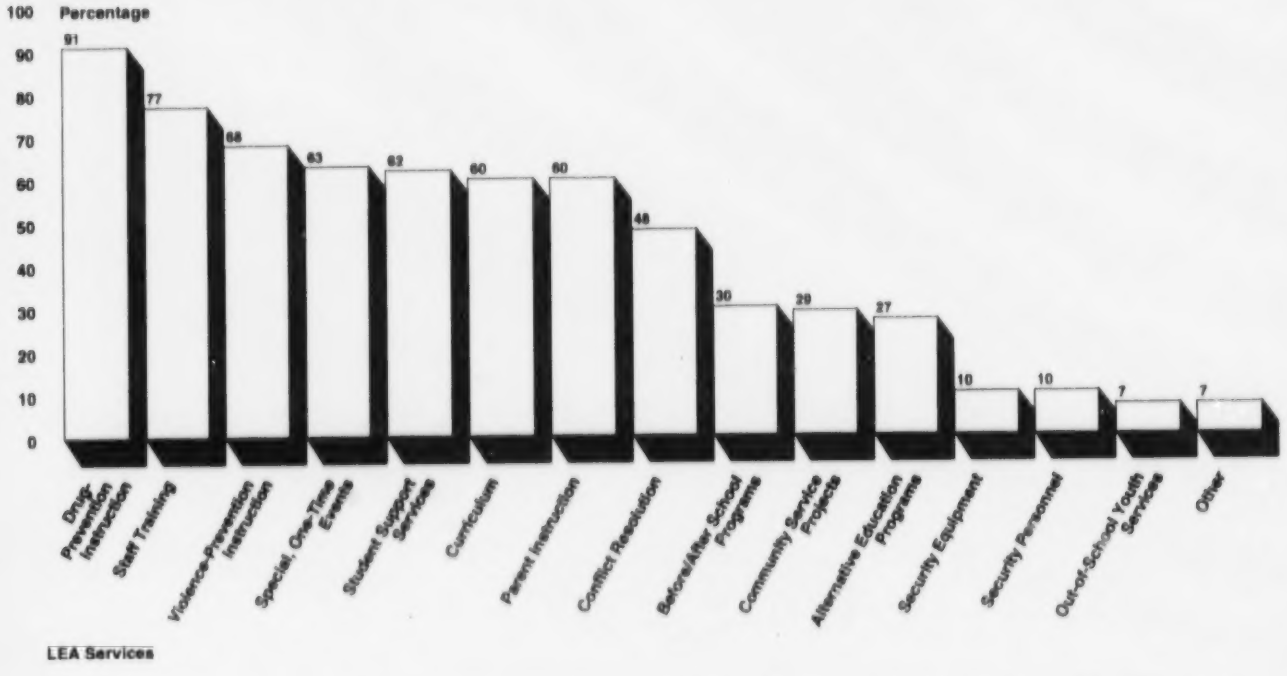
Figure 2: Nationwide, Most States Use Safe and Drug-Free Schools Money for Staff Training



Note: The state activities categories are those used in the Safe and Drug-Free Schools and Communities Act to describe allowable activities.

LEAs provide a broad range of activities to students with Safe and Drug-Free Schools program funds, according to state officials (see fig. 3). These activities include drug-prevention instruction (provided by 91 percent of the LEAs) and violence-prevention instruction (provided by 68 percent of LEAs) and staff training on new drug-prevention techniques and use of new curriculum materials; special one-time events, such as a guest-speaker, or drug- and alcohol-free social activities, such as a dance or picnic; parent education/involvement; student support services, such as counseling and referral services; and curriculum development and acquisition. Ninety-one percent of LEAs provide drug-prevention instruction. Staff training is the next most offered activity, with 77 percent of districts reporting such training.

Figure 3: Most LEAs Provide Drug-Prevention Instruction and Staff Training With Safe and Drug-Free Schools Funds



Note: The LEA service categories are those used by the U.S. Department of Education in its survey of SEAs for school year 1996-97.

Conclusions

The Safe and Drug-Free Schools program is one of several substance abuse- and violence-prevention programs funded by the federal government. The major purpose of the programs is to help the nation's schools provide a disciplined environment conducive to learning by eliminating violence in and around schools and preventing illegal drug use. States and localities have wide discretion in designing and implementing programs funded under the act. They are held accountable for achieving the goals and objectives they set as well as for the federal dollars they spend.

As permitted under the act, states and localities are delivering a wide range of activities and services. Likewise, accountability mechanisms have

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been established and appear to be operating in ways consistent with the act.

The lack of uniform information on program activities and effectiveness may, however, create a problem for federal oversight. First, with no requirement that states use a consistent set of measures, the Department faces a difficult challenge in assembling the triennial reports so that a nationwide picture of the program's effectiveness emerges. Second, although Education provides a mechanism for states to report information annually, under the act, nationwide information on effectiveness and program activities may only be available every 3 years, which may not be often enough for congressional oversight.

Agency Comments

The Department of Education provided written comments on a draft of this report, and we incorporated, where appropriate, technical clarifications it suggested. In addition, the Department expressed concern about our observations on the multiple programs designed to address youth violence and drug abuse. In the Department's view, "the discussion of the numerous Federal programs designed to reduce or eliminate youth drug use or violence treats the topic too generally. While other Federal programs may address various aspects of these two very serious problems, we know of no other Federal program that provides widely available, sustained support to schools to prevent or reduce youth drug use or violence. The draft fails to provide detailed information about these other, numerous Federal programs, and reaches a tentative conclusion about duplication and effectiveness that is not supported by this draft report."

We did not revise our reference to the multiple programs in response to this comment because (1) we state only that the potential for duplication exists among these multiple, nonintegrated programs and (2) we also state that we did not fully examine these programs to document the extent to which this may be true for drug and violence programs. In addition, this background information provides what we consider to be an important general context for considering the Safe and Drug-Free Schools program. The additional detail about the other programs has been reported in our other products cited in the footnotes.

We are sending copies of this report to appropriate House and Senate committees and other interested parties. Please call me at (202) 512-7014

or Eleanor L. Johnson on (202) 512-7209 if you or your staff have any questions. Major contributors to this report are listed in appendix IV.

Carlotta C. Joyner
Director, Education and
Employment Issues

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Abbreviations

ESEA	Elementary and Secondary Education Act of 1995
IG	Inspector General
LEA	local education agency
RESA VIII	Regional Education Service Agency VIII
SEA	state education agency

Site Visit Reports

Michigan

The key issue in this allegation—that the state improperly used federal drug education funding to implement a comprehensive health curriculum—resulted from a state legislative review of the Michigan Department of Education's implementation of a comprehensive school health curriculum. The state review, which had been prompted by parents' concerns about the curriculum content, uncovered questionable expenditures of federal drug-prevention funding under the Drug-Free Schools and Communities Act for curriculum materials not related to drug education as well as questionable fiscal practices. In addition to the legislative review, Michigan's Director of Drug Control Policy conducted his own investigation. His review and that of the state auditor concluded that many of the expenditures for the comprehensive school health curriculum violated federal requirements for federal drug-prevention funding.

As a result of the state auditor's adverse audit findings, the U.S. Department of Education became involved. Federal officials reviewed the audit findings and issued final rulings on whether the expenditures under question violated federal requirements. Although state auditors questioned the expenditures for the comprehensive health curriculum, upon obtaining further information from state officials,[22] Education found these expenditures acceptable. Education, however, did find that the Michigan Department of Education had violated other federal requirements in managing federal drug-prevention funding. The 1994 passage of the Safe and Drug-Free Schools and Communities Act contained an administrative provision that authorized the use of Safe and Drug-Free Schools funding and, retroactively, the use of Drug-Free Schools and Communities Act funding for comprehensive health programs.

The Facts Reviewed

Between 1992 and 1994, members of the state legislature and the director of Michigan's Office of Drug Control Policy charged Michigan state education officials with improperly using federal Drug-Free Schools and Communities Act funding to implement a statewide comprehensive school health program. The program, called the Michigan Model for Comprehensive School Health Education, sought to educate students about maintaining health and included a drug education component. The program sparked controversy when parents statewide expressed opposition to their state representatives.

[22]Education questioned Michigan Department of Education officials about the proportion of the comprehensive health curriculum devoted to drug education and the proportion of federal drug-prevention funding spent for the curriculum.

In response to these complaints, state legislators launched their own inquiry. During their investigations, legislators came to question the appropriateness and legality of using federal Drug-Free Schools funding to implement a comprehensive health education program. In addition, they uncovered questionable administrative practices and expenditures made with Drug-Free Schools funding.

In 1994, the Family Law, Mental Health and Corrections Committee of the Michigan State Legislature released a report of its investigation into the Michigan Department of Education's management of federal Drug-Free Schools funding. The Committee examined seven issues, concluding that the Michigan Department of Education (1)"diverted" federal Drug-Free Schools funds "to activity not related to drug prevention" and (2) illegally restricted local school districts' discretion in using their drug education funds. The Committee also concluded that "a history of poor grant management and oversight by the department of education" had occurred and found that greater accountability was needed to ensure the proper uses of public funds.[23] Among its recommendations, the Committee called for performance audits of Drug-Free Schools grantees and state-level agencies involved with Drug-Free Schools program expenditures.

The Committee's findings echoed the findings of earlier investigations by the state's Office of Drug Control Policy. Calling the Michigan Model's implementation the "Michigan Morass," the Director of the Michigan Office of Drug Control Policy asserted that the problem rested in "how funds diverted to it were obtained and administered," especially federal Drug-Free Schools funds.[24] The many problems cited by the director included questionable bidding practices on competitive contracts, potential "double-dipping" by state employees who served as both program coordinators and paid consultants, and the purchase of curriculum materials not directly related to the drug education components of the Michigan Model. According to him, these purchases included giant toothbrushes, a human torso model, dog bone kits, and bicycle pumps.

Because of the state audit findings, the issue of the use of Drug-Free Schools funds for delivering a drug education program through a

[23]Final Report, Michigan Department of Education's Management of Federal Drug-Free Schools and Communities Act Funds, Family Law, Mental Health and Corrections Committee, Michigan State Legislature (Lansing, Mich.: Dec. 29, 1994).

[24]Senate Testimony and Final Drug Education Report, Office of Drug Control Policy (Lansing, Mich.: Oct. 12, 1993).

comprehensive school health curriculum came before the U.S. Department of Education for resolution. Specifically, state auditors had found that (1) the Michigan Department of Education failed to "appropriately document to what extent Drug-Free Schools and Communities Act (Drug Free Schools) funds could be used to fund comprehensive health education programs in accordance with statutory and regulatory requirements," and (2) "the level of funding provided by [the act] to support the Michigan Model exceeds the relative weight of drug abuse education and prevention criteria contained in the Michigan Model."[25] Federal education officials did not sustain these findings.

Education's rejection of these findings rested on its analysis of the federal law, provisions of nonregulatory guidance, and a 1991 ruling by Education's Assistant Secretary for Elementary and Secondary Education on the issue. Citing federal nonregulatory guidance on this issue, Education pointed out that LEAs may include drug abuse education and prevention in a comprehensive health education program, but the expenditure of Drug-Free Schools funds is limited to the drug abuse education and prevention program components. Education also noted that the guidance did not "specify particular methods to be used in determining the proportionate share of a comprehensive health education program to be funded by the Drug Free Schools Act."[26] Referring to its previous ruling, Education said the Michigan Department of Education had demonstrated through an analysis of the Michigan Model's curriculum content that the level of Drug-Free Schools funding for the Model was consistent with the Model's level of drug abuse education and prevention content.

Though the state auditor challenged the Michigan Department of Education's methodology for determining program content, Education ruled that "the auditors provided no evidence to demonstrate that the methods used by the subcommittee were in violation of any statutory or regulatory requirements."[27] Education concluded, "Consequently, there is insufficient information to establish that the [Michigan State Department of Education] has violated the requirements contained in the [Drug-Free Schools and Communities Act] and other applicable regulations related to the proportionate use of these funds for the Michigan Model."

[25]Letter of Determination dated Sept. 28, 1995, from Thomas W. Payzant, Office of Elementary and Secondary Education, U.S. Department of Education, to Arthur Ellis, Superintendent of Public Instruction, Lansing, Michigan.

[26]Determination Letter dated Sept. 28, 1995, from Office of Elementary and Secondary Education, U.S. Department of Education.

[27]Determination Letter dated Sept. 28, 1995, from Office of Elementary and Secondary Education, U. S. Department of Education.

Though Education officials rejected auditors' findings on the uses of Drug-Free Schools funds for implementation of the Michigan Model, it sustained audit findings on several other points. In brief, Education sustained audit findings that the Michigan Department of Education failed to (1) respect the broad discretion granted local grantees in developing their drug education programs, (2) ensure that LEA grant application requirements were fulfilled, and (3) evaluate programs in accordance with federal requirements. The Department required the state to take appropriate corrective actions.

Virginia

A LEA's use of Drug-Free Schools funding to provide out-of-town training for members of its school/community coalitions led to concerns that these expenditures did not meet federal criteria. Although the Drug-Free Schools Act permitted a wide range of activities, state and local education agencies were also required to adhere to the Education Department's General Administrative Regulations. These regulations include a requirement that costs be "necessary and reasonable" and discuss the allowability of certain kinds of costs.

The state learned of the allegation when a caller reported the alleged misuse of funds to the Governor's Fraud Hotline. The complaint was forwarded to the Virginia Department of Education's internal auditor for an investigation, which included interviews with local officials and a review of county auditors' report on the LEA's expenditures. Ultimately, state officials concluded the expenditures were allowable under federal requirements but expressed concern about the appearance of fiscal impropriety. The entire matter was resolved without federal intervention.

The Facts Reviewed

In 1995, the Governor's Office, through its fraud hotline, received an allegation charging the Fairfax County Public Schools with the misuse of Drug-Free Schools funds. An anonymous caller to the hotline alleged that Fairfax County school district officials were using federal Drug-Free Schools and Communities Act (Drug-Free Schools) funds for staff training sessions at an expensive summer resort. The call was referred to the Virginia State Department of Education's internal auditor for investigation.

State officials learned that the Fairfax County Public Schools had sponsored a total of 11 training sessions—each for 2-1/2 days—between March 1994 and April 1995 in St. Michael's, Maryland. The sessions, designed to facilitate the formation of school-community coalitions to

support and enhance school-based drug use prevention activities, trained community representatives, business owners, school board members, alternative school staff, and members of the Fairfax County Board of Supervisors. In all, the district trained 876 individuals at a total cost of $181,397.71, or $207 per participant, according to Fairfax County public school officials.

In the course of their investigation, state officials also learned that the district's fiscal year 1994 expenditures had been audited to determine if Fairfax County Public Schools' Drug-Free Schools and Communities grant was being administered in compliance with federal and state requirements. The subsequent audit report discussed the expenditures for the district's training sessions in St. Michael's. Auditors concluded that federal statutes had not been violated but stated the training sessions could be seen as excessive, unnecessary, and social in nature and cited Education Department General Administrative Regulations requirements that expenditures be "necessary and reasonable for proper and efficient administration of the grant." The auditors cited the Regulations' requirements that the grant not authorize expenditures for entertainment or social activities, including "costs for amusements, social activities, meals, beverages, lodging, rentals, transportation and gratuities." Although the auditors concluded that the training expenses had been reasonable—the room expenses were no more than an average hotel room in the Washington, D.C., metropolitan area, and meals had been reasonably priced—they questioned the need to hold the training sessions out of state.

On the basis of the local auditor's findings and information obtained from district officials, Virginia State Department of Education officials concluded the costs for the St. Michael's training sessions were reasonable. Though commending the LEA's "School/Community Action Team" concept, state officials cautioned the district to take special precautions in guaranteeing that the district's activities and expenditures were viewed by the school as necessary, reasonable, and consistent with the purposes of the Drug-Free Schools grant. The state fully reimbursed the district for each training session after the audit findings were discussed, and the state made procedural changes to avoid a similar incident in the future.

West Virginia

The key issue in this allegation—that the state failed to ensure that local programs deliver a clear "no use" message and that locals comply with

federal requirements for expenditures and financial management—has been addressed by federal reviews of state and local activities under the Drug-Free Schools Act. Regarding the lack of a "no use" message, federal officials found that insufficient evidence existed to support this claim. As noted previously, federal officials did observe instances of noncompliance with financial management requirements. However, both the SEA and the LEA have taken steps to correct these problems.

The Facts Reviewed

In March 1995, the Chief Counsel of the House Subcommittee on National Security, International Affairs, and Criminal Justice met with a West Virginia parent to discuss her concerns about drug education and prevention programs. In subsequent correspondence with the Chief Counsel, the parent reiterated her concerns, charging a lack of accountability on federal officials' part in ensuring state and local compliance with the Drug-Free Schools Act. Local officials, she said, implemented a curriculum teaching "that only abuse of a drug is harmful, leading our youth to believe and implying that moderation and occasional use of cocaine, marijuana, or alcohol might be an acceptable choice for themselves." The parent also said she had withdrawn her children from her district's drug-education program but expressed concern for children still enrolled in the program.

The parent's letter to the Chief Counsel was not the first expression of her concern about West Virginia's implementation of the Drug-Free Schools Act. For example, she asked federal officials in the U.S. Department of Education in 1991 to conduct a formal investigation of the QUEST curriculum used by her West Virginia school district, Jefferson County.[28] Characterizing the curriculum as "non-directive," she said she objected to the curriculum's lessons in self-esteem and values clarification. The concerns she raised ultimately resulted in a program review by Education's Drug-Free Schools officials and a limited-scope audit by Education's Inspector General (IG). In addition, the Office of National Drug Control Policy, at this same parent's request, reviewed the QUEST curriculum to assess its compliance with federal statutes. Both entities concluded that the curriculum violated no federal statutes.

Federal officials performed two site reviews of Drug-Free Schools programs in West Virginia. The first, conducted in 1992, was performed in response to allegations that the county violated federal requirements when

[28]QUEST is a commercially developed and marketed curriculum used by many school districts nationwide.

it failed to adopt and implement a program to prevent students' use of illicit drugs and alcohol.[29] As part of their review, federal officials interviewed appropriate state and local educational agency personnel and examined relevant texts and other materials. As a result of this review, a Department official concluded in September 1992 "that there is sufficient evidence to indicate that Jefferson County does offer a drug prevention program for students in all grades."

Education officials conducted another review of West Virginia's Drug-Free Schools program, focusing on SEA activities, in 1994.[30] The review uncovered several problems with administrative practices, including the following:

- The West Virginia Department of Education incorrectly calculated LEA awards in fiscal years 1993 and 1994.
- LEA applications failed to require all the information and assurances specified by the federal statute.
- LEA applications did not, but should, include information that allowed the SEA to assess the use of Drug-Free Schools funds at the local level.
- The West Virginia Department of Education failed to separately account for program activities and expenditures versus administrative activities and expenditures.
- The West Virginia Department of Education may wish to require receipts or other evidence from LEAs before reimbursing funds for program activities.

The report also noted significant improvements in the state's monitoring of and technical assistance to LEAs. In addition, federal officials commended the West Virginia Department of Education on its peer review process.

In 1995, Education's IG performed a limited-scope audit of selected aspects of Regional Education Service Agency VIII's (RESA VIII) administration of the federal Drug-Free Schools and Communities Act programs to determine if the agency was administering the federal Drug-Free Schools program in compliance with applicable statutes and regulations. Overall,

[29]The full requirement of the law was that districts adopt and implement a program to prevent the use of illicit drugs and alcohol by students that, at a minimum, includes age-appropriate, developmentally based drug and alcohol education and prevention programs (which address the legal, social, and health consequences of drug and alcohol use and which provide information about effective techniques for resisting peer pressure to use illicit drugs or alcohol) for students in all grades of the schools operated or served by the LEA from early childhood level through grade 12.

[30]This review included activities funded under the Governor's Program of Drug-Free Schools. Since activities under the Governor's Program are beyond the scope of our review, findings pertaining to it are excluded from the discussion in this site report.

the IG found the agency's internal controls for providing management with reasonable assurance that assets are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit correct financial reporting—sufficient for the Drug-Free Schools program.[31]

The IG cited two cases of material noncompliance with federal laws and regulations, however. First, RESA VIII had failed to fulfill requirements of the federal Single Audit Act of 1984 by not conducting annual audits. Second, RESA VIII used an inappropriate indirect cost rate during fiscal years 1992, 1993, and 1994 when it based its indirect cost on that of its fiscal agent, Berkeley County. The IG's recommendations included instructions to both the RESA and the state. Recommendations to RESA VIII included (1) that the agency develop appropriate, reasonable indirect cost rates for fiscal years 1992 through 1994 and (2) obtain audits for all years required in accordance with the federal Single Audit Act and applicable regulations. The IG also recommended that the West Virginia Department of Education (1) cease requiring grantees of federal funds to use inappropriate indirect cost rates, (2) require RESA VIII to develop and submit to the West Virginia Department of Education its own indirect cost rate in accordance with federal requirements, and (3) require RESA VIII and all other RESAs to report to the Department their indirect cost rate audit results.

[31]Audit Results of RESA VIII's Administration of the Federal Drug-Free Schools Program, Office of the Inspector General, U.S. Department of Education (Washington, D.C.: Sept. 1995), p. 4.

Methodology

To address your concerns about Safe and Drug-Free Schools' accountability provisions and their implementation, we asked four questions: (1) What accountability measures are required under the act at the federal, state, and local levels? (2) What activities are used by Education for overseeing state and local programs? (3) How do SEAs ensure local programs' compliance with the act? and (4) What specific uses are made of Safe and Drug-Free Schools funding at the state and local levels?

To determine what is required under the act, we reviewed relevant documents, such as the act and its legislative history, relevant sections of the Code of Federal Regulations, and other related legislation.

To assess what actions Education is taking, we followed up on allegations of impropriety in three states (Michigan, Virginia and West Virginia), reviewing documentation and interviewing state and local officials involved in the original incident and in the investigation and resolution (see app. I for a description of each of these site visits). We also reviewed documents at Education's headquarters in Washington, D.C., and interviewed Department officials.

In addition, we reviewed Department of Education state files for 16 states: Connecticut, Delaware, Illinois, Indiana, Iowa, Massachusetts, Michigan, Missouri, Nebraska, Nevada, New York, Rhode Island, Tennessee, Texas, West Virginia, and Wyoming. These state files included documentation, such as a copy of the state's plan, the reviewers' comments, materials from the state responding to Education's request for supplemental information, and grant award documents. States were selected using a stratified, random sample.

To select states for site visits, we used two main techniques to help identify allegations. First, we followed up on leads provided by correspondence to a member of the Congress. For example, a set of seven letters given to us alleged improper use of funds. We reviewed these letters and called all seven authors to clarify their complaints. On the basis of the letters and phone calls, we eliminated six of these allegations from our investigation because they concerned curriculum issues. Because the Safe and Drug-Free Schools Act makes curriculum a state and local issue—the Secretary of Education is specifically prohibited from prescribing or proscribing specific materials or approaches—curriculum could not be used as a basis for inappropriate use of federal funds. We did visit the site of the seventh allegation—West Virginia. We also chose the West Virginia

program because it had been audited by the Inspector General (IG) of the Department of Education and was the subject of other Department of Education reviews, providing us with much information that could be reviewed in a relatively short time. Second, in reviewing the legislative history, we found that a floor debate in the House had mentioned a number of other allegations. One, the alleged misuse of funds in Virginia for training retreats held in a resort location in Maryland, had been the subject of investigations, giving us ample data to review. Therefore, we chose Virginia for a site visit. Finally, the use of Drug-Free Schools and Communities Act program funds in Michigan for a comprehensive health program had already prompted a large state-level investigation. We chose Michigan for a site visit because of the importance of this investigation.

To determine what oversight was required and assess accountability activities at the state and local level, we surveyed the 50 states, the District of Columbia, and Puerto Rico about their activities, receiving information from all 50 states, Puerto Rico, and the District of Columbia.[32]

Although we did not verify the data the states supplied us, we did review supporting documentation they provided and used our site visits to Michigan, Virginia, and West Virginia to collect examples of how the law was being implemented and to observe accountability practices at the state and local level. Most information about state accountability, however, collected through the questionnaire and follow-up phone calls was reported by SEAs. Our work was conducted from February 1996 to May 1997 in accordance with generally accepted government auditing standards.

[32]Puerto Rico provided draft responses to our survey, but we could not obtain a final official response from Puerto Rico before completing our analysis. We have included these draft responses as applicable.

Appendix III

Data on Safe and Drug-Free Schools

The tables in this appendix provide information, by state, on selected aspects of states' Safe and Drug-Free Schools and Communities programs. Table III.1 provides the amount of each SEA's school year 1995-96 allocation; tables III.2, III.3, III.4, and III.5 provide information on the activities funded by Safe and Drug-Free Schools grants. Information about state accountability mechanisms, such as methods used for monitoring and distributing funds, appears in tables III.6 and III.8. Table III.7 provides information on private school participation in the Safe and Drug-Free Schools program. Table III.9 provides information on how states selected their neediest districts.

Table III.1: Safe and Drug-Free Schools Funding Amount by State, School Year 1995-96

Dollars in millions

State	State grant amount
Alabama	$5.8
Alaska	1.7
Arizona	5.1
Arkansas	3.5
California	38.4
Colorado	4.1
Connecticut	3.2
Delaware	1.7
District of Columbia	1.7
Florida	14.8
Georgia	8.6
Hawaii	1.7
Idaho	1.7
Illinois	15.1
Indiana	6.2
Iowa	3.1
Kansas	2.9
Kentucky	5.5
Louisiana	7.7
Maine	1.7
Maryland	5.1
Massachusetts	6.4
Michigan	13.6
Minnesota	5.1
Mississippi	5.0
Missouri	6.3

(continued)

Dollars in millions

State	State grant amount
Montana	1.7
Nebraska	1.9
Nevada	1.7
New Hampshire	1.7
New Jersey	8.4
New Mexico	2.7
New York	26.0
North Carolina	7.4
North Dakota	1.7
Ohio	14.4
Oklahoma	4.3
Oregon	3.5
Pennsylvania	14.7
Puerto Rico	9.3
Rhode Island	1.7
South Carolina	4.6
South Dakota	1.7
Tennessee	6.2
Texas	27.4
Utah	2.5
Vermont	1.7
Virginia	6.4
Washington	5.8
West Virginia	2.7
Wisconsin	6.3
Wyoming	1.7

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Table III.2: Percent of Funds Used for Various Activities by SEAs, School Year 1995-96

State	Staff training/technical assistance
Alabama	55
Alaska	80
Arizona	70
Arkansas	15
California	34
Colorado	50
Connecticut	65
Delaware	25
District of Columbia	0
Florida	70
Georgia	90
Hawaii	40
Idaho	70
Illinois	20
Indiana	70
Iowa	19
Kansas	59
Kentucky[a]	
Louisiana	97
Maine	40
Maryland	98
Massachusetts	80
Michigan	100
Minnesota	60
Mississippi	65
Missouri	27
Montana	55
Nebraska	55
Nevada	35
New Hampshire	50
New Jersey[a]	
New Mexico[b]	0
New York	75
North Carolina	80
North Dakota	54
Ohio[a]	

Curriculum	LEA cost-effective programs	Demonstration projects	Violence training/technical assistance/prejudice	Special LEA grants	Evaluation at state-level activities
10	5	5	20	0	5
8	0	0	12	0	0
20	10	0	0	0	0
5	0	80	0	0	0
8	9	5	8	0	36
0	0	4	25	20	1
10	0	0	25	0	0
35	10	15	5	10	0
0	0	100	0	0	0
1	1	4	0	23	1
0	0	0	0	8	2
20	5	15	10	5	0
0	0	0	5	0	25
10	0	50	0	10	10
10	10	5	0	5	0
0	0	0	0	0	81
2	35	0	4	0	0
3	0	0	0	0	0
30	20	0	10	0	0
0	2	0	0	0	0
0	0	0	20	0	0
0	0	0	0	0	0
10	0	0	30	0	0
15	10	5	5	0	0
4	69	0	0	0	0
10	0	0	20	10	5
9	5	12	5	9	5
25	25	5	5	0	5
10	30	5	5	0	0
0	0	0	0	96	0
0	0	0	25	0	0
10	0	0	0	0	10
0	0	0	44	2	0

(continued)

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State	Staff training/technical assistance
Oklahoma	90
Oregon	50
Pennsylvania	100
Puerto Rico	20
Rhode Island	37
South Carolina[a]	
South Dakota	80
Tennessee	60
Texas[c]	
Utah	35
Vermont	100
Virginia	95
Washington	85
West Virginia	29
Wisconsin	75
Wyoming	40

Curriculum	LEA cost-effective programs	Demonstration projects	Violence training/technical assistance/prejudice	Special LEA grants	Evaluation at state-level activities
2	2	2	2	1	1
10	2	3	25	5	5
0	0	0	0	0	0
17	0	0	20	40	3
15	0	22	16	0	10
1	0	0	5	0	14
0	10	30	0	0	0
60	0	0	0	0	5
0	0	0	0	0	0
5	0	0	0	0	0
0	0	0	0	10	5
17	23	0	20	1	10
10	0	0	10	0	5
20	10	0	10	10	10

[a]No data available.

[b]The remaining 4 percent of the funds were carried over to 1996.

[c]All funds were provided to Educational Service Centers to fund Safe and Drug-Free Schools Education Service Center contact positions.

Table III.3: Percent of LEAs in Each State Providing Selected Services, School Year 1995-96—Teacher/Staff Training, Drug-Prevention Instruction, Violence-Prevention Instruction, Curriculum Development/Acquisitions, and Student Support Services

State[a]	Teacher/staff training	Drug-prevention instruction	Violence-prevention instruction	Curriculum development/ acquisitions	Student support services
Alabama	90	100	100	100	80
Alaska	30	95	45	60	20
Arizona	80	80	50	30	70
Arkansas	95	99	98	10	60
California	50	95	60	50	50
Colorado	100	100	100	75	70
Connecticut	65	100	70	85	60
Delaware	100	100	100	80	100
Florida[b]					
Georgia	98	100	75	60	60

(continued)

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State[a]	Teacher/staff training	Drug-prevention instruction	Violence-prevention instruction	Curriculum development/ acquisitions	Student support services
Idaho	100	100	75	100	100
Illinois	80	80	90	50	60
Indiana	100	100	80	80	100
Iowa	50	68	36	50	0
Kansas	93	100	0	86	100
Kentucky	100	100	100	90	45
Louisiana	100	100	100	100	5
Maine	45	95	55	15	55
Maryland	95	100	0	87	100
Massachusetts	70	90	60	60	30
Michigan	100	100	50	100	40
Minnesota	90	100	85	50	75
Mississippi	80	97	80	90	75
Missouri	95	100	90	70	60
Montana	85	100	85	85	85
Nebraska	96	100	100	96	91
Nevada	82	82	70	50	60
New Hampshire	75	98	50	60	40
New Jersey[b]					
New Mexico	70	100	60	15	85
New York[c]					
North Carolina	100	100	100	95	100
North Dakota	78	77	77	64	38
Ohio	74	92	58	62	56
Oklahoma	80	100	40	30	50
Oregon	85	100	80	50	95
Pennsylvania	60	80	40	30	95
Rhode Island	63	100	55	72	83
South Carolina	100	100	70	85	80
South Dakota	100	100	50	85	80
Tennessee	70	80	40	30	30
Texas	80	88	[d]	69	61
Utah	100	100	100	100	100
Vermont	90	100	60	100	90
Virginia	75	80	80	63	62
Washington	70	80	80	60	80
West Virginia	59	100	[d]	43	100

(continued)

State[a]	Teacher/staff training	Drug-prevention instruction	Violence-prevention instruction	Curriculum development/ acquisitions	Student support services
Wisconsin	15	40	5	10	5
Wyoming	40	30	5	40	70

[a]The District of Columbia, Hawaii, and Puerto Rico are not included because they each have one LEA. See app. I.

[b]Data were collected by state but were not available at the time of our survey.

[c]LEAs provided this information to the state, however, the data were not aggregated at the state level.

[d]No knowledge.

Table III.4: Percent of LEAs in Each State Providing Selected Services, School Year 1995-96—Alternative Education Programs, Parent Education/Involvement, After- or Before-School Programs, Community Service Projects, and Out-of-School Youth Services

State[a]	Alternative education programs	Parent education/ involvement	After- or before-school programs	Community service projects	Out-of-school youth services
Alabama	70	100	70	80	25
Alaska	5	15	0	5	10
Arizona	35	80	40	40	[b]
Arkansas	50	50	10	20	10
California	70	90	60	30	[b]
Colorado	50	80	25	40	60
Connecticut	25	35	50	15	0
Delaware	100	100	80	90	0
Florida[b]					
Georgia	25	50	15	15	10
Idaho	40	100	25	20	40
Illinois	0	90	10	10	0
Indiana	35	100	100	30	[b]
Iowa	0	0	46	0	0
Kansas	40	82	34	34	10
Kentucky	60	65	25	10	5
Louisiana	3	60	0	0	0
Maine	5	28	8	2	2
Maryland	75	100	87	87	75
Massachusetts	10	50	20	0	0
Michigan	20	32	57	58	0

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State[a]	Alternative education programs	Parent education/ involvement	After- or before-school programs	Community service projects	Out-of-school youth services
Minnesota	10	50	10	33	10
Mississippi	100	50	15	20	1
Missouri	40	30	55	95	5
Montata	35	75	40	50	15
Nebraska	33	81	37	51	11
Nevada	70	70	50	40	25
New Hampshire	10	75	10	10	1
New Jersey[b]					
New Mexico	25	40	25	25	5
New York[c]					
North Carolina	90	95	60	90	15
North Dakota	4	62	5	41	1
Ohio	19	58	24	30	2
Oklahoma	5	80	10	5	5
Oregon	30	60	25	15	5
Pennsylvania	20	25	15	15	10
Rhode Island	8	55	3	0	1
South Carolina	35	100	33	25	0
South Dakota	8	60	20	20	0
Tennessee	5	25	5	10	5
Texas	28	64	24	26	7
Utah	100	100	80	100	70
Vermont	5	90	25	10	2
Virginia	22	50	16	28	8
Washington	20	40	40	60	20
West Virginia	2	48	43	16	36
Wisconsin	1	1	1	0	0
Wyoming	10	60	5	10	2

[a]The District of Columbia, Hawaii, and Puerto Rico are not included because they each have one LEA. See app. I.

[b]Data were collected by state but were not available at the time of our survey.

[c]LEAs provided this information to the state; however, the data were not aggregated at the state level.

Table III.5: Percent of LEAs in Each State Providing Selected Services, School Year 1995-96—Special, One-Time Events, Conflict Resolution/Peer Mediation, Security Staff, Security Equipment, and Other

State[a]	Special, one-time events	Conflict resolution/ peer mediation	Security staff	Security equipment	Other
Alabama	100	50	15	5	0
Alaska	60	40	0	0	0
Arizona	80	60	3	16	2
Arkansas	20	20	1	5	0
California	100	72	30	50	0
Colorado	50	60	15	15	0
Connecticut	3	65	17	3	0
Delaware	25	90	0	0	0
Florida[b]					
Georgia	75	50	15	5	0
Idaho	100	80	10	2	0
Illinois	20	30	10	0	[c]
Indiana	100	80	[b]	[b]	35
Iowa	0	0	0	5	[c]
Kansas	80	55	22	19	[c]
Kentucky	80	45	1	1	0
Louisiana	98	100	10	10	[c]
Maine	15	40	1	1	0
Maryland	91	8	16	8	100
Massachusetts	30	50	5	0	0
Michigan	100	25	3	3	0
Minnesota	50	85	5	10	0
Mississippi	90	50	10	50	0
Missouri	75	65	30	20	0
Montana	95	85	2	0	100
Nebraska	82	19	4	0	0
Nevada	82	50	25	12	0
New Hampshire	80	45	1	1	0
New Jersey[b]					
New Mexico	50	65	30	10	0
New York[d]					
North Carolina	95	90	0	0	0
North Dakota	56	0	1	0	14
Ohio	84	61	7	5	[c]
Oklahoma	100	40	5	5	0

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State[a]	Special, one-time events	Conflict resolution/ peer mediation	Security staff	Security equipment	Other
Oregon	5	75	10	5	0
Pennsylvania	15	45	15	5	0
Rhode Island	14	42	0	3	[c]
South Carolina	100	40	10	40	0
South Dakota	100	40	0	0	0
Tennessee	30	30	5	15	0
Texas	73	40	[b]	[b]	[c]
Utah	100	80	50	10	0
Vermont	20	80	0	0	0
Virginia	42	42	1	3	[c]
Washington	85	60	5	5	[c]
West Virginia	5	78	0	2	2
Wisconsin	5	15	1	1	0
Wyoming	80	20	5	2	0

[a]The District of Columbia, Hawaii, and Puerto Rico are not included because they each have one LEA. See app. I.

[b]Data were collected by state but were not available at the time of our survey.

[c]Some LEAs provided more than one other type of service.

[d]LEAs provided this information to the state, however, the data were not aggregated at the state level.

Table III.6: States' Most Often Used Methods for Monitoring LEAs

State	Site visits	Review of documentation	Technical assistance	Telephone calls (monitoring)	Other	Multiple	Did not monitor
Alabama							X
Alaska		X					
Arizona	X						
Arkansas			X				
California	X						
Colorado						X	
Connecticut[a]							
Delaware	X						
Florida						X	
Georgia		X					
Idaho					X		
Illinois	X						

(continued)

State	Site visits	Review of documentation	Technical assistance	Telephone calls (monitoring)	Other	Multiple	Did not monitor
Indiana	X						
Iowa		X					
Kansas				X			
Kentucky	X						
Lousiana							X
Maine		X					
Maryland	X						
Massachusetts	X						
Michigan		X					
Minnesota	X						
Mississippi	X						
Missouri	X						
Montana						X	
Nebraska				X			
Nevada							X
New Hampshire						X	
New Jersey	X						
New Mexico	X						
New York	X						
North Carolina						X	
North Dakota					X		
Ohio					X		
Oklahoma	X						
Oregon		X					
Pennsylvania		X					
Rhode Island							X
South Carolina				X			
South Dakota	X						
Tennessee		X					
Texas						X	
Utah		X					
Vermont	X						
Virginia					X		
Washington						X	
West Virginia				X			
Wisconsin					X		
Wyoming	X						

(Table notes on next page)

Note: Hawaii is not included in this table because it has only one LEA.

[a]Missing data.

Table III.7: Private School Participation in Safe and Drug-Free Schools Program

State	Number of private not-for-profit schools	Number of private not-for-profit schools participating	Number of students participating
Alabama	225	[a]	27,800
Alaska	[a]	[b]	[b]
Arizona	[a]	75	15,100
Arkansas	[a]	35	10,200
California	4,158	[b]	[a]
Colorado	384	90	48,800
Connecticut	337	[b]	[b]
Delaware	164	85	15,000
District of Columbia	61	36	[a]
Florida	1,168	[a]	[b]
Georgia	521	[a]	[a]
Hawaii	63	34	10,100
Idaho	80	17	500
Illinois	1,380	[a]	[a]
Indiana	961	307	69,700
Iowa	204	204	44,800
Kansas	152	[a]	28,000
Kentucky	300	199	49,400
Lousiana	392	[a]	113,300
Maine	103	42	10,500
Maryland	1,113	209	57,400
Massachusetts	176	[a]	[a]
Michigan	1,067	800	176,700
Minnesota	543	407	62,600
Mississippi	45	67	18,500
Missouri	445	400	95,000
Montana	[a]	[a]	11,300
Nebraska	224	219	40,700
Nevada	99	[a]	[a]
New Hampshire	150	110	16,800
New Jersey	1,006	886	205,000
New Mexico	142	51	11,900

(continued)

State	Number of private not-for-profit schools	Number of private not-for-profit schools participating	Number of students participating
New York	2,142	[b]	[b]
North Carolina	545	28	4,900
North Dakota	65	65	8,000
Ohio	878	[b]	[b]
Oklahoma	200	200	[b]
Oregon	335	[a]	[a]
Pennsylvania	2,179	1107	278,100
Puerto Rico	532	8	3,000
Rhode Island	170	126	21,500
South Carolina	380	[b]	[b]
South Dakota	167	92	11,800
Tennessee	[a]	[a]	[a]
Texas	[a]	867	165,600
Utah	54	36	2,100
Vermont	103	40	6,500
Virginia	[a]	[a]	32,300
Washington	48	125	5,000
West Virginia	662	104	4,300
Wisconsin	980	490	100
Wyoming	31	4	200

[a]Missing data.

[b]Data were collected by state but were not aggregated at the state level.

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Table III.8: Method Used to Distribute Funds by State

	Basis			
State	Reimbursement	Forward funding	LEA request	Other
Alabama	X			
Alaska	X			
Arizona		X		
Arkansas		X		
California		X		
Colorado	X			
Connecticut	X			
Delaware	X			
Florida				X
Georgia			X	
Idaho	X			
Illinois	X			
Indiana	X			
Iowa		X		
Kansas	X			
Kentucky				X
Lousiana	X			
Maine		X		
Maryland				X
Massachusetts		X		
Michigan	X			
Minnesota	X			
Mississippi	X			
Missouri	X	X		
Montana				X
Nebraska	X			X
Nevada				X
New Hampshire	X			
New Jersey		X		
New Mexico[a]			X	
New York	X			
North Carolina			X	
North Dakota	X			
Ohio				X
Oklahoma	X			
Oregon	X			

(continued)

	Basis			
State	Reimbursement	Forward funding	LEA request	Other
Pennsylvania		X		
Rhode Island	X			
South Carolina	X			
South Dakota				X
Tennessee			X	
Texas				X
Utah	X			
Vermont				X
Virginia	X			
Washington				X
West Virginia	X			
Wisconsin	X			
Wyoming				X

Note: Hawaii is not included in this table because it has only one LEA.

*Missing data.

Table III.9: Method Used to Select Neediest Districts by State

	Selection method	
State	Application	Formula
Alabama	X	
Alaska	X	
Arizona	X	
Arkansas	X	
California		X
Colorado	X	
Connecticut	X	
Delaware	X	
Florida	X	
Georgia	X	X
Idaho	X	
Illinois		X
Indiana		X
Iowa	X	
Kansas	X	
Kentucky	X	
Lousiana	X	

(continued)

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State	Selection method	
	Application	Formula
Maine	X	
Maryland	X	
Massachusetts	X	
Michigan	X	
Minnesota	X	X
Mississippi[a]		
Missouri[a]		
Montana	X	
Nebraska		X
Nevada	X	
New Hampshire	X	
New Jersey	X	
New Mexico[a]	X	
New York		X
North Carolina	X	X
North Dakota	X	
Ohio		X
Oklahoma	X	X
Oregon	X	
Pennsylvania	X	X
Rhode Island	X	
South Carolina		X
South Dakota	X	
Tennessee	X	X
Texas	X	X
Utah		X
Vermont	X	
Virginia	X	
Washington	X	
West Virginia	X	
Wisconsin	X	
Wyoming	X	

Note: Hawaii is not included in this table because it has only one LEA.

[a]Missing data.

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